AFSLCC 2000

COORDINATION OF FRAUD REMEDIES

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TYPES OF FRAUD

- PRODUCT SUBSTITUTION
- COST MISCHARGING
- PROGRESS PAYMENT
- TRUTH IN NEGOTIATION

ROLE OF AFC

- COORDINATE REMEDIES
- PREPARE REMEDIES PLANS
- INTERVENTION RECOMMENDATION
- SETTLEMENT RECOMMENDATION
- SETTLEMENT FUND CITES
- SUSPENSION AND DEBARMENT

POTENTIAL REMEDIES

- **CRIMINAL**
- **CIVIL**
- **ADMINISTRATIVE**
- **CONTRACT**
- **PREVENTIVE ACTIONS**

CRIMINAL REMEDIES

- **FALSE CLAIMS**
- **FALSE STATEMENTS**
- **CONFLICT OF INTEREST**
  - 18 USC 201 et seq

CIVIL REMEDIES -- FALSE CLAIMS ACT

- **BROUGHT BY GOVERNMENT**
- **QUI TAM ACTIONS**
  - PRIVATE SUITS UNDER FALSE CLAIMS ACT
  - INTERVENTION RECOMMENDATION
  - RELATOR'S SHARE
    - GOVERNMENT INTERVENES
    - GOVERNMENT DOES NOT INTERVENE

ADMINISTRATIVE REMEDIES

- **SUSPENSION AND DEBARMENT**
  - INDICTMENT
  - CONVICTION
  - FACT-BASED
  - NOTICE/MATTERS IN OPPOSITION
  - LEGAL REVIEW

CONTRACT REMEDIES

- **INSPECTION CLAUSE**
- **TERMINATION FOR DEFAULT**
- **GRATUITIES CLAUSE**
- **RECISSION**

REQUIREMENT FOR REMEDIES PLANS

- **ESTIMATED LOSS IN EXCESS OF $100,000**
- **CASE INVOLVES CORRUPTION**
  - CONFLICT OF INTEREST
  - BRIBE/GRATUITY
  - KICKBACK
- **HAZARD TO HEALTH, SAFETY, OR ORGANIZATIONAL READINESS**
- **SIGNIFICANT AIR FORCE INTEREST**

REMEDIES PLAN SECTIONS

- ADMINISTRATIVE DATA
- ALLEGATIONS
- CONTRACT REVIEW
- POTENTIAL REMEDIES
- MISCELLANEOUS

QUALITY PLANS

- PROACTIVE INVOLVEMENT BY ACQUISITION FRAUD COUNSEL
- COMPLETE DESCRIPTION OF ALLEGATION
- ALL POTENTIAL REMEDIES ANALYZED
- PREVENTIVE MEASURES CONSIDERED

UPDATE REQUIREMENTS

- **EVERY SIX MONTHS**
- **SIGNIFICANT EVENTS**
- **CONTENTS**
  - MOST RECENT CASE STATUS REPORTS
  - RESPOND TO MAJCOM REVIEW COMMENTS
  - RESPOND TO SAF/GCQ AND SAF/AQCX COMMENTS